

EXHIBIT 3

From: [Kyle D. Stroup](#)
To: [Peter Curtin](#); [Nathan F. Studeny](#); [Jon W. Groza](#); [Jon J. Pinney](#)
Cc: [Yichen Cao](#); [Campbell, Jay R.](#); [Ostrowski, Carter S.](#); [Elliot Mendelson](#)
Subject: RE: NOCO v. Aukey, et al., 1:20-cv-02322 (ND Ohio) - Deposition Notices for Discussion
Date: Thursday, December 21, 2023 4:49:31 PM

Thanks for sending these along, Pete. As we discussed earlier today on our phone call, we will confer with the proposed deponents and our client and report back with some acceptable dates. We also discussed that, given the pending discovery dispute between the Parties and Analects Legal's motion to withdraw as counsel for Defendants, your proposed depositions will not be occurring on January 2nd or January 3rd.

We also look forward to reviewing your proposed motions for extension of time to respond to the discovery dispute letter and for extension/stay of the case deadlines. We will also be on the lookout for Defendants' supplemental responses to NOCO's First Set of Requests for Admissions and Defendants' objections to NOCO's Fed. R. Civ. P. 30(b)(6) deposition notice of Defendants' corporate representatives and proposed topics for examination contained therein.

Please let us know if you have any questions.

Thank you,

KYLE D. STROUP

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From: Peter Curtin <pcurtin@analectslegal.com>
Sent: Thursday, December 21, 2023 3:49 PM
To: Kyle D. Stroup <kds@kjk.com>; Nathan F. Studeny <nfs@kjk.com>; Jon W. Groza <jwg@kjk.com>; Jon J. Pinney <jjp@kjk.com>
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Subject: RE: NOCO v. Aukey, et al., 1:20-cv-02322 (ND Ohio) - Deposition Notices for Discussion

Hello Counsel –

Please find attached copies of the individual deposition notices served last night with some typos corrected for the sake of clarity.